

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Kyle Donovan,
Plaintiff,

Civil Action

v.

East Twelfth Street Tenants Housing
Development Fund Corporation

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**NOTICE OF MOTION FOR
TEMPORARY RESTRAINING ORDER**

Pursuant to Fed. R. Civ. P. 65, Plaintiff Kyle Donovan hereby moves the Court to issue a Temporary Restraining Order prohibiting Defendant East Twelfth Street Tenants Housing Development Fund Corporation (the “Co-op”) from approving the sale to a purchaser other than Plaintiff the Property, Unit #MW at 527 East 12th Street, New York, NY, along with the accompanying 250 shares in the Corporation, until this Court decides on Plaintiff’s forthcoming motion for a preliminary injunction and, if the Court so elects, holds a hearing.

In support of this motion, Plaintiff relies upon:

1. Plaintiff’s memorandum of law in support the motion including certification of the undersigned attorney in writing stating the efforts made to give notice and the reasons why it should not be required and attached exhibits (*i.e.*, Exhibit 1 -- executed contract between Plaintiff and Seller; and Exhibit 2 -- a demand letter to Co-op);
2. Plaintiff’s verified complaint (Dkt. #1); and
3. Proposed Temporary Restraining Order.

DATED: August 2, 2018

Respectfully Submitted,

/s/T. Bryce Jones, Esq.

T. Bryce Jones, Esq.

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